

## REMARKS/ARGUMENTS

The rejections presented in the Office Action dated March 13, 2006 (hereinafter Office Action) have been considered. Claims 1-19 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

Claims 1-19 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. According to the Office Action, the terms “not directly addressable” as added by amendment to Claims 1, 9, and 16-19 are not supported in the specification. The Applicant respectfully traverses the rejection.

“To satisfy the written description requirement, a patent specification must describe the claimed invention in sufficient detail that one skilled in the art can reasonably conclude that the inventor had possession of the claimed invention.” MPEP § 2163. “To comply with the written description requirement of 35 U.S.C. 112, para. 1 ... each claim limitation must be expressly, implicitly, or inherently supported in the originally filed disclosure.” MPEP § 2163.05. “[A] rewording of a passage where the same meaning remains intact is permissible.” MPEP § 2163.07, *quoting In re Anderson*, 471 F.2d 1237, 176 USPQ 331 (CCPA 1973). Although the Applicant agrees that the term “not directly addressable” is not expressly set forth in the Specification, the Applicant can show that there is sufficient support in the Specification as filed so that one skilled in the art can reasonably conclude that the Applicant had possession of the subject of Claims 1-19 at the time of filing.

Generally, the present invention is directed to the problem of servicing requests from a mobile device that is not reachable in a network using the standard network protocols. For example, page 2, lines 25-29 of the Specification states:

First, routing of HTTP requests to mobile terminals is a challenge due to the lack of IP address capability for mobile terminals. Mobile terminals are not assigned fixed IP addresses currently and it is expected that IP addresses for mobile terminals will not be assigned for quite some time to come.

It is inherent that a mobile terminal that lacks IP address capability is not directly addressable on an IP network. Even when a mobile terminal has an IP address, it is possible that a requestor lacks the ability to reach the terminal because, for example, the IP address is

not fixed as described above, thus may be arbitrarily assigned. Thus, it is inherent that a terminal that has an arbitrary or unknown IP address is not directly addressable because, without knowledge of the destination IP address, a requestor cannot directly send requests using the IP protocol. Also see page 14, lines 4-5, which states:

An exemplary HTTP request line ... includes the familiar URI pathname, "http://www.w3.org/pub/WWW/", and the file "TheProject.html" is to be retrieved as a result of the "GET" request from the URI. Mobile terminals, however, do not have an IP address or a URI associated with them. Therefore, HTTP GET request-line (1) is not compatible with, for example, mobile terminal 302, when content is desired to be retrieved from mobile terminal 302.

It is also inherent that a mobile terminal that lacks a known URI and/or URI-to-IP address mapping lacks the ability to be directly addressed by a URI using mechanisms associated with protocols such as HTTP (e.g., using a DNS lookup). Although other examples of non-addressability may be present in the Specification and otherwise known in the art, the above examples are sufficient to show Applicant had possession of the subject of Claims 1-19 at the time of filing. Therefore, withdrawal of the rejection is respectfully solicited.

Applicant notes that there were no prior art rejections of Claims 1-19. Therefore, based on the remarks above, the Applicant respectfully requests allowance of the pending claims. Authorization is given to charge Deposit Account No. 50-3581 (NOKM.052PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact him at to discuss any issues related to this case.

Respectfully submitted,

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Date: July 5, 2006

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